

From: Krista Sloniowski [mailto:Sloniowski@hotmail.com]

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To: DWR IRWM Grants

Subject: Comments on IRWM Plan Standards

Hello, I had some comments/questions about the IRWM Plan Standards that you all put out in draft form in the workshops that were recently held around the State:

- **Only Projects?:** The Project Review Process standard subsumed the Prop 50 Implementation standard, which included policy, programs, plans, studies and projects. However, I don't see mention of Programs or Policies or Studies, etc. in the new Project Review standard, or in the new Governance standard which also took a piece of the Implementation pie. Should we assume that the State process is only wants us to make projects a priority? Since the State does have funding for things other than projects, such as grants for watershed coordinator positions & so on, it seems like the IRWM program as a whole should make some room for these things, even if specific funding sources within the State are dedicated only to projects. The language in your spreadsheet doesn't specifically exclude these things as a part of a review process for what gets implemented, but it doesn't mention them at all.
- **Implementation Level vs Planning Level Project Information:** In the Project Review Process standard it lists some expectations that may be beyond what should actually happen in a Regional planning process and belong more to a project implementation data collection process. The purpose of planning is not only to collect info about projects, it is more importantly to figure out a relationship between them that will achieve some kind of desired common outcome. These findings then provide guidance to more detailed project design that comes later. Planning takes high level project information and identifies relationships between them, targets that need to be reached to achieve some desired outcome, etc. Then individual projects that rise to the surface of the planning process go through a more specific and detailed design process where things like specific benefits, budgets, economic analysis occurs. But that is a next step.

It seems to me that requiring a review process for a planning document that requires things like technical feasibility, specific (quantified) benefits, costs and financing, and economic analysis for each and every project that we consider is unrealistic (and not all that helpful) for a planning level effort.

You guys are jumping ahead of yourselves a bit because this is information that should be required for the Implementation proposals, rather than having it take over what should be a planning process.

When the best projects rise to the top and we know generally what we want them to achieve, and we have support from the necessary stakeholders/agencies, then we'll go and develop that level of information for those specific projects so that we can apply for implementation money. When agencies see these requirements put in the planning process they lose track of the whole point of planning and narrow their focus back down to specific projects they need to develop this information for, before they even have figured out how those projects fit into the larger hydrologic system in any purposeful way.

The other factors you identify in the Project Review Process standard, like how projects contribute to IRWMP objectives & strategies, general benefits, EJ considerations and integration, all make sense for the planning prioritization level. Those projects that have a high priority based on this level of review will then have to be the focus of a more detailed analysis and development in order to go into the implementation stage. But at least we'll have picked the most strategic projects to focus this additional level of effort on.

Thanks,

KRISTA SLONIOWSKI

PRESIDENT, CONNECTIVE ISSUE INC.

8212 GRIMSBY AVE,
LOS ANGELES, CA 90045

310-435-8773
SLONIOWSKI@HOTMAIL.COM